

EXHIBIT “1”

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

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	:	
1526 52 ND LLC,	:	
	:	
<i>Plaintiff,</i>	:	
	:	Index No. 515379/2018
- against -	:	
	:	VERIFIED COMPLAINT
BLUMA LEFKOWITZ A/K/A BLUMA LEFKOWITZ,	:	
	:	
<i>Defendants.</i>	:	
-----	X	

Plaintiff 1526 52ND LLC ("Plaintiff") by and through its undersigned attorneys, alleges, for its verified complaint against defendant Bluma Lefkowitz a/k/a Bluma Lefktwiz ("Defendant") upon information and belief as follows:

PRELIMINARY STATEMENT

1. This action is brought pursuant to RPAPL Article 15 and the general equitable powers of this Court, seeking a judicial declaration and striking as of record a deed that was recorded and that which purportedly transferred the property known as 1526 52nd Street, Brooklyn, New York 11219, designated as Block 5471, Lot 16, County of Kings (the "Premises").

2. Plaintiff purchased the Premises for good and valuable consideration from Defendant on or about August 1, 2014 and the Deed for the Premises was recorded with the Kings County Clerk's Office on August 14, 2014 as CRFN #2014000272253.

3. On or about June 26, 2018, without any authority from Plaintiff, Defendant executed a deed on behalf of Plaintiff to Defendant which was recorded with the Kings County Clerk's Office on July 11, 2018 as CRFN #2018000228345 (the "Fraudulent Deed").

4. Plaintiff bring this action for quiet title and to have the Fraudulent Deed removed of record from the Kings County Clerk's register.

PARTIES

5. Plaintiff 1526 52nd LLC is a New York limited liability company with offices in Kings County, New York.

6. Rivka Ashkenazi is the current sole member of Plaintiff.

7. Defendant Bluma Lefkowitz a/k/a Bluma Lefkowitz is an individual residing in Kings County, New York.

FIRST CAUSE OF ACTION **(QUIET TITLE)**

8. Plaintiff repeats and realleges each of the allegations set forth in each preceding paragraph, as if fully set forth herein.

9. This cause of action is brought pursuant to Article 15 of the Real Property Actions and Proceeding Law.

10. No defendant is unknown and no defendant is or might be an infant, mentally retarded, mentally ill or an alcohol abuser.

11. The judgment will not affect a person or persons not in being or ascertained at the commencement of the action, who by any contingency contained in a devise or grant or otherwise, could afterward become entitled to a beneficial estate or interest in the property involved.

12. Every person in being who would have been entitled to such estate or interest if such event had happened immediately before the commencement of the action is named as a party hereto.

13. Defendant has claimed an estate, interest and/or right to the Premises by the Fraudulent Deed.

14. Defendant claims, or it appears from the public records that Defendant may claim, an estate or interest in the Premises adverse to that of the Plaintiff.

15. Defendant claims to be the owner of the Premises pursuant to the Fraudulent Deed.

16. Plaintiff maintains ownership interest by fee simple absolute in the Premises.

17. By reason of the foregoing, Plaintiff is entitled to judgment that Defendant is barred from any estate or interest in the Premises which Defendant ever had, claimed or may claim in the Premises or in any party thereof, and any and all liens and encumbrances which ever existed, were claims or may be claimed in favor of Defendant, including the estates and interests claimed or which may be claimed by Defendant by virtue of the Fraudulent Deed, are void *ab initio*, and invalid as against the interest of Plaintiff which it now owns and holds in the Premises.

18. Unless a declaratory judgment is rendered by the Court determining the respective rights and interests of the parties, the Plaintiff will be adversely affected and the Plaintiff shall continue to suffer damages as a result.

19. By reason of the foregoing, Plaintiff requests and is entitled to a declaratory judgment that the Defendant has no right, title, claim, lien, mortgage or interest in the Premises whatsoever, at law or at equity, and that the Plaintiff is the owner of the Premises in fee simple absolute, free and clear of any claims which Defendant may have to an ownership interest, lien interest, mortgage interest, or any other interest in the Premises.

20. Plaintiff has no adequate remedy at law.

21. No previous application for the relief requested herein has been made to this or any other court.

SECOND CAUSE OF ACTION
(Fraud)

22. Plaintiff repeats and realleges each of the allegations set forth in each preceding paragraph, as if fully set forth herein.

23. Defendant executed the Fraudulent Deed misrepresenting that she is an authorized member of Plaintiff and that she had authority to transfer the Premises from Plaintiff to herself for no consideration.

24. Defendant knew her statements in the Fraudulent Deed were false when made and were made with the intent that others would rely upon such representations.

25. Defendant's actions were gross, wanton and willful as she knew she did not have authority to execute the Fraudulent Deed.

26. By reason of the foregoing, Defendant has damaged Plaintiff in an amount believed to exceed \$5,000,000.00, plus attorneys' fees, the full amount of which will be established at trial.

THIRD CAUSE OF ACTION
(Conversion)

27. Plaintiff repeats and realleges each of the allegations set forth in each preceding paragraph, as if fully set forth herein.

28. Defendant unlawfully conveyed the Premises to herself without Plaintiff's permission or knowledge and converted the Premises to her own improper and unauthorized use.

29. To date, Defendant has not returned the Premises to Plaintiff.

30. By reason of the foregoing, Defendant has damaged Plaintiff in an amount believed to exceed \$5,000,000.00, plus attorneys' fees, the full amount of which will be established at trial.

CLAIM FOR RELIEF


WHEREFORE, Plaintiff respectfully request that judgment be granted as follows:

- a) On its First Causes of Action, a declaratory judgment that: Plaintiff is the owner of the Premises in fee simple absolute free and clear of any claims or encumbrances of Defendant; that Defendant and all persons and entities claiming under Defendant be forever barred from all claim to an estate or interest in the Premises;
- b) On its First Causes of Action, that it be adjudged and finally determined that the Plaintiff is the lawful owner and are vested with an absolute title in fee simple absolute to the Premises and that the sole and complete possession of the Premises be awarded to the Plaintiff and that the Plaintiff remain in possession thereof; and that Defendant and anyone claiming any title or interest through, after or under them, be permanently barred and enjoined from in any way, directly or indirectly, disturbing or interfering with the Plaintiff's quiet enjoyment of the Premises; and
- c) On its First Causes of Action, a judgment declaring the Fraudulent Deed from Plaintiff to Defendant be void *ab initio* and vacated from the County Clerk's records.
- d) On its Second and Third Cause of Action, awarding Plaintiff against Defendant in an amount to be determined at trial, but believed to exceed \$5,000,000.00;
- e) that the Plaintiff recover its costs, disbursements, and allowances against any Defendant answering in this action; and

f) for such other and further relief in favor of Plaintiff as this court deems just and proper.

Dated: Valley Stream, New York
July 27, 2018

ROSENBERG & STEINMETZ PC
Attorneys for Plaintiff

By: 
Rachelle Rosenberg
181 S. Franklin Ave, Suite 604
Valley Stream, New York 11581
(212) 743-9904

VERIFICATION

STATE OF NEW YORK)

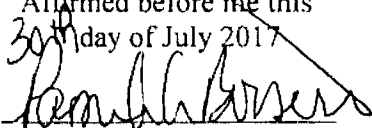
ss:

COUNTY OF KINGS)

Rivka Ashkenazi, affirms, under penalty of perjury that: I am Member of Plaintiff 1526 52nd LLC, the Plaintiff in the above action; I have read the annexed Verified Complaint and the contents thereof, and I know the same to be true, of my own knowledge, except as to matters therein stated on information and belief and, as to the latter, I believe them to be true, based upon documents in my possession and my personal knowledge of the facts of this action.

Dated: Brooklyn, New York
July 27, 2017


Rivka Ashkenazi

Affirmed before me this
30th day of July 2017

Notary Public

PAMELA A. BOSSERT
Notary Public, State of New York
No. 01BO6105137
Qualified in Sullivan County
Commission Expires February 2, 2020